

O'NEILL / HASSEN

Attorneys at Law

November 29, 2022

VIA ECF and Email

Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: *US v. Chika Nwafo*, 19 Cr. 781 (PKC)

Dear Judge Castel:

I write to respond to the Court's order directing me to explain what protection an ankle monitor offers without a curfew. ECF #220.

I have discussed the matter with Mr. Nwafo's probation officer in Texas, and he explains that his office does not generally consent to the removal of ankle monitors but that it does consent to the lifting of this curfew. He further explained that the ankle monitor notifies probation if the monitored party leaves the permitted geographic area. This is called stand-alone monitoring and is used to ensure compliance with location and travel restrictions that are imposed by the Court. In this case the stand-alone monitor would restrict Mr. Nwafo's travel to the Southern District of Texas and the Southern and Eastern Districts of New York. The probation department would automatically receive an alert if Mr. Nwafo left the Southern District of Texas.

I again request that the Court modify the conditions of Mr. Nwafo's release to lift the curfew that is currently in place.

I thank the Court for its attention to this matter.

Respectfully submitted,

/s/

Grainne E. O'Neill

Renewed
motion is
GRANTED.
SO ORDERED
J. Smith
USDJ
12-14-22